

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal No. 04-29 E
	)	
OLUFUNSO OLAWUNMI SHASANYA	)	

**MOTION TO AMEND CONDITIONS OF BOND**

AND NOW, comes the defendant, OLUFUNSO OLAWUNMI SHASANYA, by his attorney, Thomas W. Patton, Assistant Federal Public Defender, and respectfully files this Motion to Amend Conditions of Bond, and in support thereof sets forth as follows:

1. Mr. Shasanya is charged with three counts of using unauthorized access devices in violation of Title 18 U.S.C. § 1029(a)(2) and 1029(b)(1), and three counts of identity theft in violation of Title 18 U.S.C. § 1028(a)(7) and 1028(b)(1)(D).

2. On June 14, 2004, this Court released Mr. Shasanya on a \$ 25,000 recognizance bond with the following conditions:

- a. Surrender passport to Pre-Trial Services;
- b. Obtain no passport;
- c. refrain from possessing a firearm, destructive device, or other dangerous weapon;
- d. refrain from excessive use of alcohol;
- e. refrain from use or unlawful possession of controlled substances; and
- f. home detention at 219 Hickory Street, Buffalo, New York with the detention to be monitored by electronic monitoring with the defendant ordered to pay the cost of the program based upon his ability to pay as determined by the pretrial services office;

3. After his release, Mr. Shasanya was extradited to Ohio where he pled guilty to numerous

offenses related to the federal offense. Mr. Shasanya served a year of incarceration in the Ohio Department of Corrections.

4. Mr. Shasanya is now residing at 219 Hickory Street, Buffalo, New York, and is being supervised by the pretrial services office in Buffalo, New York. Currently Mr. Shasanya is unemployed with no source of income. Mr. Shasanya is being charged a daily fee for electronic monitoring.

5. Based upon Mr. Shasanya's unemployment, he does not have the ability to pay for the cost of electronic monitoring.

6. Mr. Shasanya respectfully requests that this Court order that he not be charged the fee for electronic monitoring while he remains unemployed, and that he not be responsible for any unpaid fees that have accrued.

7. Undersigned counsel has spoken with Assistant United States Attorney Marshall J. Piccinini and the United States does not object to this motion.

WHEREFORE, the defendant, OLUFUNSO OLAWUNMI SHASANYA, respectfully requests that this Honorable Court amend the conditions of his bond.

Respectfully submitted,

/s/ Thomas W. Patton  
Thomas W. Patton  
Assistant Federal Public Defender  
PA I.D. No. 88653